

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

**NOTICE OF MOTION  
TO WITHDRAW**

v.

**SIMON GOGOLACK**

Defendant

23-CR-99

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PLEASE TAKE NOTICE that, upon the annexed affirmation of John M. Ange, a motion will be made at Federal District Court, Western District of New York, before Hon. Lawrence Vilardo, United States District Court Judge, at 2 Niagara Square, Buffalo, New York, on a day and time the Court shall set, for an Order:

1. **Permitting counsel to withdraw as counsel for the defendant:** Permitting counsel to withdraw as counsel for the defendant on the grounds set out in the attached affirmation and appointing new counsel to represent the defendant.

/s/ John M. Ange  
John M. Ange  
*Attorney for Simon Gogolack*  
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43 Court Street  
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Buffalo, New York 14202  
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TO: **Hon. Lawrence Vilardo**  
United States District Court Judge  
Federal District Court  
Western District of New York

**Casey Chalbeck**  
Assistant United States Attorney  
138 Delaware Avenue, Buffalo, New York 14202

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

**CERTIFICATE OF SERVICE**

**SIMON GOGOLACK**

Defendant

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23-CR-99

(A) I hereby certify that on July 16, 2025, I electronically filed this **DEFENDANT'S MOTION TO WITHDRAW (Notice of Motion only)** with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the following participants in this case:

- 1) Casey Chalbeck, Assistant United States Attorney

(B) I hereby certify that on July 16, 2025, I personally served this **DEFENDANT'S MOTION TO WITHDRAW (Un-redacted)** on the offices of the following participants in this case:

- 1) Casey Chalbeck, Assistant United States Attorney

/s/ John M. Ange  
John M. Ange  
*Attorney for Simon Gogolack*  
Convention Towers  
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Suite 610  
Buffalo, New York 14202  
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